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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9  
10 UNITED STATES OF AMERICA, }  
11 Plaintiff, } CASE NO: 2:11-cr-00310-JCM-CWH  
12 vs. }  
13 JACOB LILL, } **UNOPPOSED MOTION TO CONDUCT A**  
14 Defendant. } **PRE-PLEA PRESENTENCE**  
15 } **INVESTIGATION REPORT AND**  
16 } **PROPOSED ORDER**  
-----})

17 COMES NOW, defendant, JACOB LILL, by and through his counsel, JAMES A.  
18 ORONOZ, ESQ., and hereby moves this Court for an Order granting the instant motion for a  
19 Pre-Plea Presentence Investigation Report (“Pre-Plea PSR”) to be prepared by the United  
20 States Department of Parole and Probation.

21 1. It is counsel’s understanding that Mr. Lill does not have any prior convictions  
22 that would disqualify him from eligibility under the Safety Valve Provision, listed at U.S.S.G.  
23 § 5C1.2(a)(1). However, counsel cannot accurately make this assessment or calculate Mr.  
24 Lill’s criminal history score without the information that would be provided in a Pre-Plea PSR.  
25 Mr. Lill’s Criminal History category will drastically impact his sentencing exposure,  
26 negotiations, and his decision as to how he should proceed in this matter. A Pre-Plea PSR will  
27 promote judicial economy and aid in the manner in which this case is timely resolved.

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2. Therefore, undersigned counsel respectfully requests this Court issue an Order directing the United States Department of Parole & Probation to conduct a Pre-Plea Presentence Investigation Report as soon as possible.

3. Undersigned counsel has spoken to the prosecutor, Assistant United States Attorney James Keller, regarding this request and he has no opposition.

DATED this 22<sup>nd</sup> day of July, 2013.

/s/ James A. Oronoz  
JAMES A. ORONOZ, Esq.  
700 South 3<sup>rd</sup> Street  
Las Vegas, NV 89101  
*Counsel for JACOB LILL*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

IT IS HEREBY ORDERED that the United States Department of Parole and Probation will prepare a Pre-Plea Presentence Investigation Report on Defendant JACOB LILL.

DATED this 23rd day of July, 2013.

C.W. Hoffmann, Jr.  
United States Magistrate Judge

# CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that I am an employee of Oronoz & Ericsson L.L.C. and is a person of such age and discretion as to be competent to serve papers.

That on July 22, 2013, I served an electronic copy of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCE INVESTIGATION REPORT AND PROPOSED ORDER by electronic service (ECF) to the person(s) named below:

DANIEL G. BOGDEN  
United States Attorney  
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*Counsel for United States*

JAMES E. KELLER  
Assistant United States Attorney  
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*Counsel for United States*

/s/      *Lucas Gaffney, Esq.*  
Employee of the Oronoz Law Offices